

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SABIR SHABAZZ,

Defendant.

NO. *mJ11-5068*

COMPLAINT FOR VIOLATION

Title 18, United States Code,
Section 1591

BEFORE, United States Magistrate Judge, Karen L. Strombom, Tacoma, Washington.

COUNT 1

(Conspiracy to Engage in Sex Trafficking)

During the time period beginning on or about July 1, 2010, and continuing through on or about September 30, 2010, at Tacoma, within the Western District of Washington, and elsewhere, SABIR SHABAZZ, and Shadina Rice, and others known and unknown knowingly did conspire and agree with each other, to recruit, entice, harbor, transport, provide, and obtain by any means, two juvenile females, JV-1 and JV-2, both who had not attained the age of 18 years old, to cause JV-1 and JV-2 to engage in a commercial sex act and to benefit financially or receive anything of value from participation in the venture.

The Complainant further alleges that the defendant had a reasonable opportunity to observe JV-1 and JV-2, whom the defendant conspired to recruit, entice, harbor, transport, provide, and obtain.

1 All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2),
2 and 1594(c).

3 **COUNT 2**

4 (Sex Trafficking)

5 During the time period beginning on or about July 1, 2010, and continuing through
6 on or about September 30, 2010, at Tacoma, within the Western District of Washington,
7 and elsewhere, SABIR SHABAZZ did, in and affecting interstate commerce, knowingly
8 recruit, entice, harbor, transport, provide and obtain, by any means, and aid and abet in
9 the recruiting, enticing, harboring, transporting, providing and obtaining, a juvenile
10 female, JV-1, with knowledge and reckless disregard of the fact that JV-1 had not yet
11 attained the age of 18 years old, and would be caused to engage in a commercial sex act.

12 All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

13 **COUNT 2**

14 (Sex Trafficking)

15 During the time period beginning on or about July 1, 2010 and continuing through
16 on or about September 30, 2010, at Tacoma, within the Western District of Washington,
17 and elsewhere, SABIR SHABAZZ, did, in and affecting interstate commerce, knowingly
18 recruit, entice, harbor, transport, provide and obtain by any means, and aid and abet in the
19 recruitment, enticement, harboring, transport, providing and obtaining, a juvenile female,
20 JV-2 with knowledge that JV-2 not yet attained the age of 18 years old, and would be
21 caused to engage in a commercial sex act.

22 All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

23 The undersigned complainant being duly sworn states:

24 1. I am a Police Officer with the Tacoma Police Department, and have been so
25 employed since July 2005. I am also a Task Force Officer with the Federal Bureau of
26 Investigation (FBI), and have been so employed since January 2010. I am currently
27 assigned to the Tacoma Resident Agency of the Seattle Division as a member of the
28 Innocence Lost Task Force. I have investigated numerous cases involving crimes against

1 children, and I am familiar with the statutes pertaining to juvenile prostitution. I have
2 attended various courses regarding the sexual exploitation of children, including a course
3 regarding juvenile prostitution.

4 2. The information in this complaint is based upon my personal knowledge,
5 from my review of Tacoma Police Incident report # 102520579.1, and information gained
6 from witnesses and law enforcement officers with personal knowledge.

7 3. On or about September 6, 2010, Tacoma Police Officer Wishard responded
8 to a complaint of a possible juvenile prostitution ring being operated out of or near the
9 donut shop at E. 56th/ Portland Ave in Tacoma, Washington. The complainant, S.L.,
10 explained to Officer Wishard that she found her runaway daughter, JV-1, a thirteen year
11 old, listed in a Backpage.com advertisement.¹ JV-1 was wearing very little clothing and
12 was going by the name of "Nichole". The advertisement listed the phone number of 253-
13 330-4023 and a list of prices. The complainant had her friend call the phone number and
14 set up a "date". Officer Wishard went to the meeting location but JV-1 never showed up.
15 Shortly thereafter, JV-1 returned home.

16 4. On or about September 10, 2010, I met with S.L. and her daughter, JV-1. I
17 first spoke with S.L. and learned that on or about August 31, 2010, JV-1 ran away from
18 home. Thereafter, S.L.'s friend was searching on Backpage.com to check up on her
19 husband when she came across an advertisement with JV-1's photograph. S.L. stated that
20 in the advertisement, JV-1 was posed in sexual positions and wearing little clothing. S.L.
21 and her son began looking at more Backpage.com advertisements and saw one of JV-1's
22 teenage friend, JV-2. S.L.'s friend called the telephone number on JV-1's advertisement.
23 An adult female answered. He set up a "date" and was told to go to Helen's donuts. He
24 went to the location but no one showed up.

25 5. On or about Saturday, September 4, 2010, JV-1 called her cousin and asked
26 her to pick her up at a convenience store on 44th and Portland Avenue, Tacoma,
27 Washington. The cousin picked up JV-1 and brought her home. Over the course of the
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¹ Backpage.com is an internet site which has advertisements for prostitution.

1 weekend, JV-1 disclosed to others that an adult female named "Shadina" had made her
2 have sex with men for money. JV-1 also disclosed to a family member that "Shadina"
3 threatened to hurt her if she did not pose for pictures and sleep with men for money.

4 6. After speaking with S.L., I interviewed JV-1. She told me that while she
5 was a runaway, she met up with her runaway friend, thirteen year old, JV-2. JV-1 and
6 JV-2 went to the defendant Shadina Rice's house. Rice allowed both girls to live at her
7 apartment. However, after a couple days, Rice told JV-1 that she would have to "work"
8 to stay in the apartment. Rice told JV-1 that she was going to take pictures of her and put
9 them on the internet. Rice further told JV-1 that she would then have sex with the men
10 who responded to the ad in exchange for money. Rice told JV-1 that she would have to
11 give her half of the money she made for "rent". JV-1 told Rice that she did not want to
12 pose the pictures and did not want to sleep with men for money. Rice stated that if she
13 didn't prostitute, she would have to leave.

14 7. JV-1 stated that Rice took sexually suggestive photographs of her and JV-2
15 wearing lingere using her G1 T-mobile cellular phone. Rice then text messaged the
16 photographs to SABIR SHABAZZ, who lives in Sea-Tac, Washington for him to use in
17 making and posting ads advertising the sexual services of the two juvenile girls. Rice
18 told JV-1 that SHABAZZ would upload the pictures onto the internet in advertisements
19 under Backpage.com website.

20 8. According to JV-1, when the "johns" (a customer of prostitution) would
21 call the 253-330-4023 phone number, Rice would answer, pretending to be JV-1. Rice
22 would set up a "date" (a meeting between prostitute and "john" for sex in exchange for
23 money) and tell the "john" to drive to the Helen's Donuts at E. 56th/ Portland Ave. When
24 the "john" arrived there, Rice would tell them how to get to the apartment. When the
25 "johns" arrived at the apartment, Rice would leave the apartment and go sit in her car in
26 the apartment complex parking lot. The "john" would go inside the apartment, JV-1
27 would have sexual intercourse or oral sex with him in exchange for money. After the
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1 "john" left, Rice would return to the apartment and have JV-1 give her all of the money
2 she earned.

3 9. JV-1 estimated that she had four (4) "johns" with whom she had sexual
4 intercourse for \$100.00, sexual intercourse and girlfriend experience ("GFE") for
5 \$160.00, and two oral sex for \$60.00. When asked what "girlfriend experience" meant,
6 JV-1 stated it meant they had sex and "kissed and stuff."

7 10. JV-1 told me that JV-2 was most likely still living with Rice at her
8 apartment. JV-1's mother also showed me a picture from a Rice advertisement which
9 showed JV-2 posing on a counter. In the reflection of the mirror I saw a woman matching
10 the description of Rice. JV-1 identified this person as Rice. Based on this information, it
11 was my belief that Rice was engaged in promoting commercial sex abuse of a minor, and
12 I initiated an investigation into Rice for promoting commercial sex abuse of a minor and
13 sex trafficking.

14 11. On September 21, 2010, I obtained a signed search warrant from Pierce
15 County Superior Court Commissioner Patrick Oishi to search both Rice's residence and
16 SHABAZZ's residence.

17 12. On September 23, 2010, myself and other officers served the search
18 warrants. Rice was arrested outside the apartment. JV-2 was located inside the
19 apartment. She appeared scared and upset. She cried as she told the officers that she
20 wanted help to get away from Rice. In the apartment the officers located several cell
21 phones, a computer, condoms, fake identification cards of JV-2, paperwork for JV-2 to
22 enroll in school with Rice's name as her guardian, and a blanket on the bed which was
23 seen recognized as being on the bed in the photographs of JV-2 which were posted on
24 Backpage.com.

25 13. The officers later searched the SHABAZZ residence at 21822 30th Ave S
26 #3, Des Moines, Washington where computers, cameras, flash drives, memory cards,
27 condoms, and cell phones were recovered.
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1 14. I subsequently interviewed JV-2 who related that in June 2010 she ranaway
2 from home. After a couple of nights on the streets, her friend took her to Shadina
3 Backpage.com's apartment. Rice offered to let JV-2 stay at her apartment on the
4 condition JV-2 work as a prostitute. JV-2 told Rice she didn't want to do that, but Rice
5 told JV-2 that she would have to leave if she didn't. Faced with being homeless again,
6 JV-2 agreed. Using a cellular telephone, Rice took photographs of JV-2 and observed
7 Rice post them onto the internet website, Backpage.com,

8 15. JV-2 stated that as a result of the internet ads, Rice received a number of
9 calls for JV-2's sexual services. Rice would set up the "dates" and the sexual acts
10 occurred at Rice's apartment.

11 16. JV-2 disclosed that she saw approximately five (5) "johns" in July,
12 approximately fifty (50) in August, and approximately five (5) in September. JV-2
13 recalled that her last "date" was the night before the interview, on September 22, 2010. .

14 17. I submitted all the computers and cell phones to Tacoma Police Department
15 Detectives Voce and J. Quilio to be processed for evidence. Detective Voce located 15
16 photographs of JV-2 and 12 photographs of JV-1 on the computer recovered from
17 SHABAZZ's residence. In these photographs JV-1 and JV-2 are dressed in lingerie and
18 /or topless and appear to be in sexually suggestive poses.

19 18. Backpage.com responded to the state warrant that I sent to them. I received
20 approximately 550 pages of information regarding the ads posted for JV-1, JV-2, and
21 Rice. The ads showed that both SHABAZZ and Rice posted the ads on to the internet
22 website. I also matched up several of the payment methods for the ads with credit cards
23 that were located in SHABAZZ'S wallet at the time of the search warrant. One of the
24 credit cards was in Rice's name and was located in SHABAZZ'S wallet. The other credit
25 cards were pre-paid credit cards and found in SHABAZZ'S wallet. The wording of the
26 advertisements are sexually suggestive and obvious invitations for commercial sex acts.
27 In the title of one of the ads which has a photograph of JV-2, it states "80 DOLLAR DAY
28 SPECIAL Ask for Tasha". "Tasha" was an assumed name JV-2 used. In another

1 advertisement for "Tasha" it states "Face down Ass Up". In another advertisement of
2 JV-2 it states "LET EM BLOW YOUR MIND" and has accompanying photographs of
3 JV-2.

4 19. I reviewed text messages recovered from Rice's cellular telephone. There
5 are a number of text messages between Rice and SHABAZZ where it appears they are
6 communicating about the sex trafficking of the two juvenile victims. The following are
7 some of the text messages that I reviewed:

8 a. SHABAZZ texts Rice, "...I posted 9 adds total 3 4 u 2 for lil bit 4 between
9 them." "Lil bit" is the name that Rice and SHABAZZ called JV-2.

10 b. In another text Rice texts SHABAZZ if he can add "lil bit" pictures back
11 on the internet, stating she wants the one where JV-2 is on the sink. In the search of the
12 computer and other digital media we recovered photographs of JV-2 sexually posed on a
13 bathroom sink. I also matched this photograph to one of the ads posted on Backpage.com

14 c. Rice texts SHABAZZ, "Can u post 4 me sabir... like can u borrow some
15 money... enough 4 two ads for JV-2 one ad now and another later please..."

16 d. Rice texts SHABAZZ, "And then you can't even post the ads... and it
17 benefits u..." which I interpreted to mean financially benefit him.

18 e. Rice texts SHABAZZ that she will send him all the pics and he can design
19 something for "all of us daddy." "Daddy" is a common term that prostitutes use when
20 referring to their pimp.

21 f. SHABAZZ texts Rice, "how the attitudes" and Rice replies, "There sleep
22 but lil bit woke up she seems cool... but I have added up what I feel I need 2 get ahead...
23 and ur ticket down payment and I'm shootin for that as soon as possible... and them I'm
24 done with them... if the attitudes don't change..." I understood this to mean that Rice is
25 raising money to help SHABAZZ pay down a ticket.

26 g. Rice texts SHABAZZ stating that she and SHABAZZ need all the money
27 she, JV-2, and "Bre" can get because "me and u have goals." I understood this to mean
28

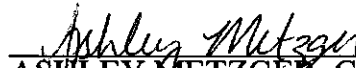
1 that Rice, JV-2 and "Bre" (still unidentified) need to make all the money they can in order
2 for Rice and SHABAZZ to meet their financial goals.

3 h. Rice texts JV-2 about having a threesome with SHABAZZ and another
4 male named "Andy" and how "fucked up" that is because Rice is with SHABAZZ. Rice
5 then texts SHABAZZ and says, "U want 2 choose up with JV-2 over me... fuck u." Rice
6 also tells "Andy", "... why do you think its cool that u and Sabir fuck JV-2."²

7 20. Both JV-1 told me that during the time she lived with Rice, herself, Rice,
8 and JV-2 went to visit SHABAZZ at his residence in the Sea Tac area. JV-1 identified
9 SHABAZZ's photograph as Rice's boyfriend. JV-1 also pointed out SHABAZZ's
10 apartment.

11 21. Both JV-1 and JV-2 appear obviously under the age of 18 years old.

12 22. Based upon the evidence obtained during the investigation, I believe there is
13 probable cause to believe that SABIR SHABAZZ was engaged in the sexual trafficking
14 of JV-1 and JV-2 in violation of Title 18, United States Code, Sections 1591(a)(1) and
15 (b)(1) and 1594(c)

16
17 
18 ASHLEY METZGER, Complainant
Task Force Agent
Federal Bureau of Investigation

19 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
20 presence, the Court hereby finds that there is probable cause to believe the defendant
21 committed the offense set forth in the Complaint.

22 Dated this 7th day of April, 2011. 

23
24
25 
26 KAREN L. STROMBOM
27 United States Magistrate Judge

28 ² Please note in the above text messages where it refers to JV-2, it actually used JV-2 true first name, not a nick name.